

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES

V.

**Criminal No:** 04-10293 JLT

**ANTHONY P. RAYMOND**

MOTION AND MEMORANDUM OF DEFENDANT  
FOR SEQUESTRATION OF WITNESSES

The defendant in the above-entitled matter respectfully moves this Honorable Court order that during the trial of the above cause, all witnesses may be sequestered and further order of this Honorable Court that all witnesses who are sequestered not talk about the case with each other until the case is over. See Rule 12(b)(2) of the Federal Rules of Criminal Procedure.

REQUEST FOR ORAL ARGUMENT

Defendant believes that oral argument will assist the Court and requests a hearing on this motion. Local Rule 7.1 (D).

*/s/Roger Witkin*  
ROGER WITKIN  
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Dated: September 12, 2005

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CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the within document was served upon the attorney of record for the United States, AUSA Paul Moore, and a courtesy copy to the Clerk of Court by mail and electronic filing, which was e-filed this day.

/s/ Roger Witkin

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DATE: September 12, 2005